

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE CHICAGO BRIDGE & IRON
COMPANY N.V. SECURITIES LITIGATION

)
) **CASE NO. 1:17-CV-1580**

)
) Hon. Lorna Schofield
)
)

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES
AND COMPENSATORY AWARDS FOR PLAINTIFFS**

KAHN SWICK & FOTI, LLC

Kim E. Miller (KM-6996)
J. Ryan Lopatka (*admitted PHV*)
250 Park Avenue, 7th Floor
New York, NY 10177
Telephone: (504) 455-1400
Fax: (504) 455-1498

Lewis S. Kahn
Craig J. Geraci, Jr. (*admitted PHV*)
1100 Poydras Street, Suite 3200
New Orleans, LA 70163
Telephone: (504) 455-1400
Fax: (504) 455-1498

*Lead Counsel for Lead Plaintiff
ALSAR Ltd. Partnership and
Class Counsel*

POMERANTZ LLP

Joshua B. Silverman (*admitted PHV*)
10 South La Salle Street, Suite 3505
Chicago, IL 60603
Telephone: (312) 377-1181
Fax: (312) 229-8811

*Counsel for Additional Plaintiffs Iron
Workers Local 40, 361, & 417 –
Union Security Funds and Iron
Workers Local 580 – Joint Funds*

Lead Plaintiff ALSAR Ltd. Partnership (“ALSAR”) and additional Plaintiffs Iron Workers Local 40, 362, & 417 – Union Security Funds and Iron Workers Local 580 – Joint Funds (“Iron Workers” and collectively with ALSAR, “Class Representatives” or “Plaintiffs”), through their undersigned counsel (Lead Counsel Kahn, Swick & Foti LLC (“KSF”) and Additional Counsel Pomerantz LLP (“Pomerantz,” and together with Lead Counsel, “Plaintiffs’ Counsel”)), respectfully move this Court for an Order: (1) awarding Plaintiffs’ Counsel attorneys’ fees of one-third (33 ¹/₃%) of the total recovery of \$44,000,000, plus accrued interest; (2) reimbursing Plaintiffs’ Counsel’s reasonable and necessary litigation expenses in the amount of \$3,462,683.78, plus accrued interest; and (3) awarding compensatory awards of \$60,000 to ALSAR, \$25,000 to Iron Workers Local 40, 362, & 417 – Union Security Funds, and \$20,000 to Iron Workers Local 580 – Joint Funds. In support thereof, Plaintiffs file the accompanying Memorandum of Law and Declaration of Kim E. Miller. A [Proposed] Order with respect to both this Motion and the Motion for Final Approval of Class Action Settlement will be attached to reply papers, so that it can be adjusted after the exclusion deadline to reflect parties seeking exclusion.

DATED: June 27, 2022

Respectfully submitted,

KAHN SWICK & FOTI, LLC

/s/ Kim E. Miller

Kim E. Miller (KM-6996)

J. Ryan Lopatka (*admitted PHV*)

250 Park Avenue, 7th Floor

New York, NY 10177

Telephone: (212) 696-3730

Fax: (504) 455-1498

Email: kim.miller@ksfcounsel.com

Email: j.lopatka@ksfcounsel.com

-and-

Lewis S. Kahn
Craig J. Geraci, Jr. (*admitted PHV*)
1100 Poydras Street, Suite 3200
New Orleans, LA 70163
Telephone: (504) 455-1400
Fax: (504) 455-1498
Email: lewis.kahn@ksfcounsel.com
Email: craig.geraci@ksfcounsel.com

*Lead Counsel for Lead Plaintiff ALSAR Ltd.
Partnership and Class Counsel*

POMERANTZ LLP
Joshua B. Silverman (*admitted PHV*)
Patrick V. Dahlstrom
10 South La Salle Street, Suite 3505
Chicago, IL 60603
Telephone: (312) 377-1181
Email: jbsilverman@pomlaw.com

-and-

Jeremy A. Lieberman
600 Third Avenue
New York, NY 10016
Telephone: (212) 661-1100
Email: jalieberman@pomlaw.com

*Counsel for Additional Plaintiffs Iron
Workers Local 40, 361, & 417 – Union
Security Funds and Iron Workers Local 580
– Joint Funds and the Class*

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing Plaintiffs' Motion for an Award of Attorneys' Fees and Expenses and Compensatory Awards on Defendants on June 27, 2022 via CM/ECF.

/s/ Kim E. Miller
Kim E. Miller